

# EXHIBIT A

GONZALEZ

1 Brookstone massager which is also really great and those  
2 things have saved my life because, honestly, I don't -- I  
3 couldn't live in that kind of pain. If I didn't have that,  
4 I don't know what I would do. I would probably -- it would  
5 not be good.

6 Q. Aside from anger, anxiety, anything else you feel  
7 currently based on the events and the lawsuit?

8 A. The anger and anxiety, just the hurt. Just  
9 feeling really hurt about the whole thing.

10 Q. During your time with DOE, the Department of  
11 Education, were there any days that you missed from work  
12 because of the actions of either Robert Rivera, Zelda  
13 Bryant or any other DOE employee?

14 A. No.

15 Q. Before working for DOE did you have other jobs?

16 A. DOH, Department of Health.

17 Q. What was the most recent job before the DOE job?

18 A. DOH.

19 Q. How long were you over there?

20 A. Nine months.

21 Q. In what capacity?

22 A. I was doing data entry. Actually, they had a  
23 unit, DOE had a unit inside DOH. We were doing the eye  
24 exams for the students in the public schools. So I was  
25 entering the eye exams into the system, the diagnosis,

GONZALEZ

1 Q. During your time at DOE what was the pay  
2 structure? Were you paid by the hour? Were you paid a  
3 salary?

4 A. \$17 an hour.

5 Q. Did that change once you took over at the  
6 position where Mr. Rivera became your supervisor?

7 A. It did not, no.

8 Q. Were you ever given any additional benefits once  
9 you switched over to the position where Rivera was your  
10 supervisor?

11 A. No.

12 Q. Did your hours change at all?

13 A. Yes.

14 Q. How so?

15 A. No. No. No, they didn't. Everyone else was  
16 there 7:30 to 3:30. I asked Robert, everyone else is here  
17 early, and I'm here -- my original hours were eight to four  
18 and I was staying there after, while everyone else was  
19 leaving. I'm like, do you want me to come here earlier?  
20 He was like, no, you can keep your hours.

21 Q. What were your hours?

22 A. Eight to four.

23 Q. During your whole time at DOE?

24 A. No. In the beginning I was doing a lot of  
25 overtime. I was working eight a.m. to eight p.m.

GONZALEZ

1 sometimes. What it was supposed to be was just eight  
2 hours.

3 Q. How many days a week?

4 A. Well, we got a lot of overtime. It was supposed  
5 to be Monday through Friday, but I came in on Saturdays and  
6 worked overtime. I came in on Sundays and worked overtime.  
7 I think that was another thing she brought up. That's why  
8 she liked me so much. Every time she needed me to do  
9 overtime, I did it. There were a lot of people who did not  
10 want to do it. She really liked the fact that I always  
11 came -- whenever she asked me, I always did it.

12 Q. When you switched over to the position where Mr.  
13 Rivera was your direct supervisor, were you ever given some  
14 type of document that said you are now a permanent  
15 employee?

16 A. No.

17 Q. Were you ever told that you were now a permanent  
18 employee or at the time a permanent employee?

19 A. I was told that before I got there, that they  
20 were going to make me permanent.

21 Q. To your knowledge did they contact Good Temps at  
22 all about your status?

23 A. No. Can I take a quick break?

24 MR. MURRELL: Sure.

25 (Whereupon, a short recess was taken.)

GONZALEZ

1 Q. How long were you going to the bathroom to  
2 attempt to avoid Rivera?

3 A. I might have been there five, ten minutes at a  
4 time.

5 Q. How often during the day?

6 A. Well, in the beginning not as much. After he  
7 grabbed my hips, I remember on that Wednesday I must have  
8 went about 20 times that day. I mean, I literally went all  
9 day. I would go to the bathroom, come sit down five, ten  
10 minutes and then get back up and go back to the bathroom.

11 Q. You had said overall that you worked under Rivera  
12 for about five days?

13 A. Something like that, yes.

14 Q. When did you start, was it day two, day three, I  
15 mean going to the bathroom to escape Mr. Rivera?

16 A. He touched me the first day. I would say by the  
17 third day I was already starting to check out, going to the  
18 bathroom, avoiding him, having a very -- my face -- I just  
19 was -- so yes, by the third day I was already checking out  
20 and going to the bathroom, and it just got worse as I  
21 reached the end, going more and more to the bathroom to  
22 avoid him.

23 Q. So you said that you would be there five to ten  
24 minutes at a time?

25 A. Maybe, yes.

GONZALEZ

1 A. No.

2 Q. Were you ever told what strenuous exercise meant?

3 A. I don't recall, no.

4 Q. What was your understanding as to what would be  
5 too heavy?

6 A. Just in general, no lifting or pulling. As far  
7 as weight, I can't tell you.

8 Q. No lifting or pulling anything at all?

9 A. I wouldn't say anything at all. I mean, if it's  
10 fairly light then yes, I can do that. Obviously if it's  
11 heavy then no.

12 Q. At some point you claim that you were forced to  
13 clean up after a catered event at DOE?

14 A. I wouldn't say forced. I was asked, yes, so I  
15 did it.

16 Q. You were asked. Okay.

17 A. Yes.

18 Q. Why did you do it?

19 A. Because I was asked.

20 Q. My question was, if you had the back problems and  
21 you couldn't lift and do all those things, why did you  
22 agree?

23 A. Remember, it was my first day. I was doing my  
24 best to make Ms. Ashby happy. I didn't want to go in there  
25 and say well, I just came from the emergency room and I